

**2005-2007 Puget Sound Priorities**  
**Puget Sound Action Team Partnership**  
**Response to Public Comments**  
**June 17, 2004**

**General Comments**

**1. Issue:** Add a priority for aquatic nuisance species (ANS).

**Response:** The Puget Sound Action Team (Action Team) partnership does not add a separate priority for aquatic nuisance species. Instead the document includes strategies and results to address the ANS issue in priorities 5 (protecting shorelines and other critical areas) and 6 (restoring degraded nearshore and freshwater habitat.) Priority 5 includes new desired results<sup>1</sup> for a ballast water management report and a result for preventing new aquatic nuisance species and minimizing the spread of existing species. Priority 6 has a new strategy for control of ANS, including implementing a rapid response plan should any new species be detected. In addition, the state Department of Agriculture includes a result for acreage of *Spartina* spp. removed in Puget Sound.

**2. Issue:** Add a priority on the role of science and monitoring to support and explain the role of PSAMP and other monitoring activities as key to identifying problems, developing management tools and approaches, and evaluating their effectiveness for adaptive management. A suggested wording: “Support and sustain an integrated monitoring and assessment program of the Puget Sound ecosystem that can provide the basis for detecting change and identifying impacts from human actions and climate change.”

**Response:** A new section is added on the role of science that integrally serves all of the priorities and therefore is not a separate priority. In the fall of 2004 the *2005-2007 Puget Sound Conservation and Recovery Plan*, the biennial work plan for Puget Sound, will include a short narrative about the role of science, the Puget Sound Ambient Monitoring Program (PSAMP), and other scientific contributions. The revised *Priorities* document includes the strategies and results for science and monitoring. The PSAMP steering and management committees will develop more specific results and activities for PSAMP and other science efforts over the summer of 2004. Results are also added to some priorities for research and monitoring to evaluate progress on the priority.

**3. Issue:** There is a need for greater emphasis on nutrient loading as a threat to Puget Sound, especially in Hood Canal.

**Response:** The introduction in the Fall 2004 work plan will include information on the Hood Canal low dissolved oxygen problem to illustrate a complex ecosystem problem the Action Team partnership is addressing. In addition, the wording of Priority 4 is revised to include nutrients as well as pathogens from human sewage and animal waste. Nutrients from other nonpoint sources are included in Priority 3 (stormwater) in the result for education and public involvement.

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<sup>1</sup> Terminology is changed to remove the term “potential objectives” and instead refer to “desired results” or “results” to avoid confusion with state Office of Financial Management budget instructions.

**4. Issue:** Add a priority to address marine-related threats to human health, such as harmful algal blooms, domoic acid, paralytic shellfish poisoning, and other threats to human health in shellfish and other seafood.

**Response:** The Action Team partnership does not add a human health priority, but will add language to the narratives for some priorities in the Fall 2004 work plan to link them to affects on human health where appropriate. A result in the new section on the role of science includes the need for research and monitoring to identify threats to human health, including harmful algal blooms.

**5. Issue:** Increase the emphasis on environmental education to acknowledge and focus work on the importance of public education and involvement.

**Response:** University of Washington Sea Grant program, Washington State University Extension, and state agency partners include new education and public involvement results for all priorities. A result for the Action Team staff in the new section on the role of the Action Team Partnership includes the Public Involvement and Education (PIE) funding program.

**6. Issue:** Focus on the list of impaired water bodies due to water quality violations as a top priority.

**Response:** No change. Priorities 2 and 4 include results for completing water cleanup plans to address water bodies that do not meet water quality standards.

**7. Issue:** Include the work of the Action Team and Puget Sound Council (Council) and the Action Team staff. The document should include role of the Action Team partnership in providing vision and strategy to manage Puget Sound through research, education, leadership, and communication.

**Response:** A separate section that is not a priority is added to describe the role of the Action Team partnership, the Puget Sound Council and Action Team staff that reflects the ongoing roles of the Action Team partnership under RCW 90.71. Strategies refer to overall planning and evaluation, environmental education, outreach, and coordinating roles. Results include the role of the Action Team partners and Council in implementing the conservation agenda for Puget Sound, setting priorities and developing the work plan for the next biennium. Roles for staff include outreach, coordinating the Public Involvement and Education Program, tracking and adaptive management of the Puget Sound effort, and staff support for the Action Team and Council.

**8. Issue:** There is a need to better integrate monitoring data at sub-regional or basin-wide scales.

**Response:** No change. The Puget Sound Ambient Monitoring Program provides some data that can be synthesized and integrated to provide basin-wide and sub-regional views. This comment will be considered in reviewing the focus of ongoing monitoring by the PSAMP steering committee over the summer of 2004 as they develop more detailed results for the science section.

**9. Issue:** There is a need for clear goals and objectives for each priority that link to measurable results under a “framework.” There is also a need to identify long-term and short-term goals.

**Response:** The Action Team mission and overarching goals from the Puget Sound Framework will be included in the narrative for the section on the role of the Action Team partnership in the Fall 2004 work plan. Each priority now includes:

- A long-term goal,
- The priority framed as an objective,
- Strategies re-formatted and enumerated for clarity, and
- “Desired results” (a terminology change from “potential objectives” to avoid confusion with state Office of Financial Management terminology.)

There is also a glossary of planning terms used in the document.

**10. Issue:** Some priorities should be ranked higher than others. In some cases comments recommended geographic priorities, however most comments on this topic supported priorities that focus on preventing harm over restoring ecosystem damage.

**Response:** The Action Team partnership has not ranked the priorities, but may look across the work plan in the fall to identify some high priority budget adjustments to recommend to the governor and the state legislature. The introduction of the Fall 2004 work plan will include a section that reflects public input on the importance of prevention over restoration.

**11. Issue:** PSAMP’s design of Puget Sound monitoring should cover long-term trends over a wider geographic range of Washington waters, and should include targeted monitoring to evaluate historic superfund sites.

**Response:** No change. Expanding the geographic coverage of PSAMP activities are addressed as PSAMP resources allow, although PSAMP will consider these comments as it evaluates and improves the program. Improved coordination between Columbia River, Georgia Basin and other regions would provide more information on long-term trends. Other agencies and programs conduct superfund site monitoring, and PSAMP can improve coordination with other monitoring programs, including superfund cleanup sites.

**12. Issue:** There is a need for more research on pollution and impacts and on most effective measures to prevent pollution.

**Response:** The work plan includes a science section that will indicate the level of commitment that agencies will be able to offer for research and monitoring. This recommendation can be considered in future research activities. In addition, priorities include results for monitoring progress.

### **Priority 1: Clean up contaminated sites and sediments**

**1. Issue:** An objective should be added to develop an action strategy for source control Soundwide, rather than just at cleaned sites.

**Response:** No change. Sound-wide source control results are included under Priority 2 for reducing and preventing toxic contamination.

**2. Issue:** The proposed strategy for this priority should be more specific.

**Response:** The strategies are more clearly defined for all priorities and are revised for this priority. The Puget Sound Action Team and Council members held discussions at a May 25, 2004 meeting around the strategic focus for each priority.

**3. Issue:** Information on contaminated sediment sites should be available to local entities in GIS format, and where it is available, on Ecology's Coastal Digital Atlas.

**Response:** The result is revised to include GIS formats. PSAT will work with Ecology to encourage adding to its Coastal Digital Atlas website all existing sediment information from the SedQual database that includes a GIS interface (see

<http://www.ecy.wa.gov/programs/tcp/smu/sedqualfirst.htm> )

**4. Issue:** The inventory of contaminated sediment sites should provide more information about the contaminants and the cleanup timelines for each site.

**Response:** No change, as this comment supports the result to make available to the public information on contaminants and timelines.

**5. Issue:** Funding for orphan sites is more important than the other objectives.

**Response:** No agency offered a result to identify funding for this purpose, so this result is not carried forward. Nevertheless, the Action Team partnership acknowledges the need to seek funding for this purpose.

**6. Issue:** Define the Dredged Materials Management Program more accurately.

**Response:** The Department of Natural Resources provided information and a result related to the program as it contributes to preventing pollution, and they are included in Priority 2 (reducing or preventing toxic contamination.)

**7. Issue:** Restructure the objectives to include five long-range objectives. Short-range outcomes would break down the long-range objectives to specific numbers of acres or sites. Long-range objectives should include: 1) Characterizing all of Puget Sound sediments for contamination; 2) Remediation of all known contaminated sites in Puget Sound; 3) Eliminating all potential adverse affects to fish and wildlife; 4) Eliminating all potential adverse health affects to humans; and 5) Developing sediment treatment technologies.

**Response:** A long-range goal is added for each priority. In addition, a more detailed long-range plan and objectives are established in the 2000 *Puget Sound Water Quality Management Plan*. The work plan includes strategies and results for the biennium.

## **Priority 2: Reduce continuing toxic contamination and prevent future contamination.**

**1. Issue:** Re-word the priority to include assessing the impacts of current contamination on biota. Add a strategy to undertake monitoring and research to better understand toxic-to-biota pathways.

**Response:** A result is added to monitor progress in reducing toxic contamination, although it does not specify impacts to biota. As PSAMP develops more detailed results, it will consider how to address the spatial and temporal patterns of toxic contamination in the marine ecosystem and the effects on biota.

**2. Issue:** Add to the narrative paragraphs more information on specific classes of toxics.

**Response:** In the Fall 2004 work plan, minor edits will be made to the description of toxics of concern. Interested parties should refer to other sources such as the Toxics Release Inventory for additional information. Ecology's website, which includes the 2001 report and will feature the 2003 report when it is available, is at <http://www.ecy.wa.gov/programs/hwtr/epcra/trids/index.html> or visit <http://www.ecy.wa.gov/biblio/0304020.html>.

**3. Issue:** More than one chemical action plan should be completed in the biennium

**Response:** Ecology's limited resources will target results listed under this priority that include implementing the mercury cleanup plan and completing one chemical action plan during the biennium.

**4. Issue:** The targets for the objective to reduce the number and volume of 25-gallon to 10,000-gallon oil spills should be 50 and 100 percent respectively.

**Response:** In the Fall 2004 work plan, Ecology will set a target for the biennium based on reducing the number of spills and volume of oil that was spilled in previous years.

**5. Issue:** Initiate a review of the effectiveness of the NPDES program.

**Response:** No change in the results, as the NPDES program has undergone several audits and reviews in recent years to improve the program. The Action Team determined that an additional review would be duplicative and not a good use of resources in terms of expected gains from the review, as compared to other needs for resources.

### **Priority 3: Reduce the harm from stormwater runoff**

**1. Issue:** Stormwater should be the highest priority.

**Response:** The Action Team received a number of comments on the relative ranking of priorities. While the priorities are not ranked, the Action Team agencies will consider this public comment in planning budgets for the next biennium.

**2. Issue:** The regulatory system should be changed to include more incentives.

**Response:** No change. There is a result to increase incentives for low impact development through the stormwater manual. Ecology is currently leading a process to increase credits in the *Stormwater Management Manual for Western Washington* (2001). The credits are intended to increase incentives for the use of low impact development practices, which focus on maintaining the natural hydrology, including infiltration rates, as a site is developed. The manual also calls for infiltration as a first choice, where feasible. Public education and involvement activities will look for and promote additional examples of incentives for stormwater regulations.

**3. Issue:** There should be increased funding for low impact stormwater demonstration projects, such as through a revolving fund.

**Response:** No change. Action Team partners agree that more funding is needed for demonstration projects. Ecology's water quality funding program and the Action Team staff-administered Public Involvement and Education (PIE) program have funded demonstration projects in recent funding cycles. See the Action Team website funding page for links to sources of funding for innovative activities. In addition, Action Team staff is working with the state's sustainability planning process to encourage demonstration projects for state-funded construction.

**4. Issue:** The state should support a broad-based campaign to promote low impact development.

**Response:** No change, as this comment aligns with strategies for this priority. Two results address low impact development. The Action Team staff, working with state, federal and local partners such as Ecology, the Department of Community, Trade and Economic Development and WSU Extension and the University of Washington Center for Water and Watershed Studies, and builder associations, plans to continue efforts to promote the practices through technical assistance, outreach, research and public involvement and education.

**5. Issue:** There should be an objective added to eliminate pollution from stormwater runoff from all new development through techniques to manage stormwater on-site.

**Response:** No change, as this comment is in line with the low impact development strategy for this priority. The Ecology *Stormwater Management Manual for Western Washington* calls for infiltration on-site as a first consideration, where feasible. Low impact development techniques focus on maximizing infiltration on-site.

**6. Issue:** An objective should be added for education and assistance on low impact development techniques for developers, planners, real estate professionals, and contractors.

**Response:** Washington State University Extension and University of Washington Sea Grant education programs add a new result for education and training for developers, planners, engineers, real estate professionals, and others on effective stormwater management techniques, including low impact development. Action Team, CTED and Ecology staff will also contribute to education and training activities under work plan funding.

**7. Issue:** There should be more mass transit in the region to reduce road runoff contamination.

**Response:** No change. The *Puget Sound Water Quality Management Plan*, the long-term plan to protect Puget Sound, does not directly address mass transit. Therefore, the biennial work plan to implement the management plan does not address mass transit. Ecology and Action Team staff, however, do provide a number of educational tips to citizens to reduce road runoff, such as driving less, using mass transit, and maintaining vehicles to minimize leaks. The management plan also calls on the Department of

Transportation to manage runoff from all state highways, and local governments to manage runoff from roadways under their authority.

**8. Issue:** Rather than setting a target for a specific number of shellfish growing areas affected by stormwater runoff, the goal should be to improve conditions in all shellfish growing areas.

**Response:** No change. The Fall 2004 work plan will establish a target for the two-year budget cycle of 2005-2007. The overall goal of the Shellfish Protection Program in the *Puget Sound Water Quality Management Plan* is to improve conditions at all shellfish growing areas. This is implemented through three priorities in the draft *2005-07 Puget Sound Priorities* document. Priority 3 focuses protection efforts at areas adversely affected by stormwater runoff. Priority 4 focuses protection efforts at areas adversely affected by inadequately treated human sewage and animal wastes. In addition, Priority 4 includes results for improving areas on the “threatened” list developed under the Early Warning System for shellfish areas with declining water quality. In Priority 5, shellfish harvesting is one of the uses, and shellfish areas are one of the types of critical areas we are aiming to protect.

**9. Issue:** The description of the effects of nutrients carried into marine waters by stormwater runoff should include the reduction of oxygen.

**Response:** The Fall 2004 work plan narrative for this priority will include this in the description of the effects of pollutants carried by stormwater.

**10. Issue:** Stormwater runoff contributes to toxic and nutrient pollution, which are important threats. Stormwater also causes physical environmental harm from high flows. Possible solutions include effective permits, implementing stormwater plans, promoting low impact development, and monitoring and adaptive management.

**Response:** No change, as this comment supports the strategies for this priority. Results include implementing permits, adopting local comprehensive stormwater programs, promoting low impact development, and monitoring and adaptive management.

#### **Priority 4: Reduce nutrient and pathogen pollution caused by human sewage and animal wastes**

**1. Issue:** There were a variety of suggested changes to the wording of priority 4: “Prevent contamination from sewage systems, onsite septic and other nonpoint sources, in particular as they affect shellfish.” Several suggestions requested clarification of the types of sewage systems; others requested adding effects on fish and other marine life.

**Response:** The Action Team partnership revised the wording to: “Reduce nutrient and pathogen pollution caused by human sewage and animal waste.” The narrative in the Fall 2004 work plan will refer to effects of these pollutants on shellfish and other marine life.

**2. Issue:** Additional focus should be placed on educating the public to encourage increased use of best management practices to reduce contamination from Priority 4 sources.

**Response:** Results are added for educating owners of onsite sewage disposal systems, livestock owners, and boaters to improve practices. Because there is a geographic focus on addressing human contributions to low dissolved oxygen in Hood Canal, the priority also includes a result specific to Hood Canal.

**3. Issue:** Place greater emphasis on enforcement of existing laws for all sources and clearer guidelines for determining proper functioning of onsite sewage systems.

**Response:** No change. The results address compliance with NPDES permits issued to municipal wastewater treatment facilities (now in Priority 2). Priority 4 includes a result for state agency technical assistance to local health jurisdictions that are responsible for enforcing rules covering onsite sewage systems. Strategies promote applying onsite system management approaches that focus on areas of greatest risk. The Department of Health is currently reviewing state rules that will strengthen the minimum requirements governing the use of small onsite sewage disposal systems for adoption by the State Board of Health. Health is currently developing the rule for large onsite sewage systems that is expected to include a risk-based management approach.

**4. Issue:** Develop baseline information on phosphorus, nitrogen, and other nutrient concentrations in critical embayments in south Puget Sound.

**Response:** No change. While the Action Team partners recognize the growing concern for south Puget Sound in particular, baseline nutrient monitoring data is available through the Puget Sound Ambient Monitoring Program (PSAMP) (See chapter 3 Pathogens and Nutrients of the *Puget Sound Update 2002* on the PSAT website at [http://www.psat.wa.gov/Publications/update\\_02/update\\_02.htm](http://www.psat.wa.gov/Publications/update_02/update_02.htm) or go to the Ecology website for more information on monitoring programs at <http://www.ecy.wa.gov/programs/eap/> ) PSAMP will consider this comment in developing more detailed results for the new science section of the work plan.

**5. Issue:** Provide funding for microbial source tracking using DNA analysis.

**Response:** No change. Microbial source tracking tends to be expensive, time-consuming, and of limited value in the field. The use of dye testing in conjunction with sampling for presence of fecal coliform bacteria has been standardized in the state as a means for identifying failing onsite sewage systems. Circumstances that necessitate use of DNA testing are limited geographically, so that funding through grants has been applied in targeted areas. Visit Ecology's website at <http://www.ecy.wa.gov/programs/wq/funding/2005/index.htm> to review agency concerns and requirements for funding this type of project. Posted on that webpage, see page 25 of Ecology's *Funding Program Guidelines for Fiscal Year 2005 (Volume 1)* "Methodologies and Technologies – Pollution Source Identification (DNA Typing)".

**6. Issue:** The lack of geographic information system (GIS) data prevents targeting public education regarding onsite system use.

**Response:** No change, as there is a result to increase the use of GIS to support management of onsite sewage system management. Homeowner education is included in a public education and involvement result.



**7. Issue:** Grants should be available to King County homeowners as an incentive to upgrade their onsite sewage systems or to connect to a public sewer.

**Response:** No change. The King County Department of Community and Human Services provides grants and loans to qualifying owners to help with repair or replacement of their onsite sewage systems. The Department of Ecology administers State Revolving Funds that support local loan programs. The Action Team staff seeks funding sources to assist homeowners with system repairs and will continue to do so.

**8. Issue:** The increasing volumes and the changing, but unknown, character of sewage discharges pose potential threats to Puget Sound.

**Response:** No change. There is a result (now in Priority 2) to achieve increased reclamation of wastewater, which reduces volumes discharged to Puget Sound. Applying stringent water quality standards to reclaimed water also addresses water quality concerns. Priority 2 also includes a result to reduce toxic loadings from individually permitted wastewater discharges, and to reduce total loadings of Persistent Bioaccumulative Toxins from wastewater discharges.

**9. Issue:** Shellfish closures are a significant concern to the Department of Natural Resources because they limit the harvest of geoduck.

**Response:** The narrative in the Fall 2004 work plan will include a mention of the geoduck resource among the aquatic resources threatened by pollution from human sewage and animal waste.

**10. Issue:** Aggressive action should be taken to encourage growth of shellfish as a natural means for improving water quality.

**Response:** No change. Shellfish serve an important filtering function in nature. However, the control of human-caused pollution through source controls should continue to receive priority attention.

**11. Issue:** A new objective should be established calling for implementation of locally developed plans in every shellfish growing area during the 2005-2007 biennium.

**Response:** No change. The Action Team partners support local action to develop closure response strategies and other plans to protect and restore shellfish growing areas. To prevent the occurrence of downgrades and closures, local governments are encouraged to create shellfish protection districts and to protect clean water and harvest opportunities by applying sound watershed and land use plans and pollution control programs.

#### **Priority 5: Protect shorelines and other critical areas that provide important ecological functions.**

**1. Issue:** Shellfish aquaculture is a benefit to nearshore habitat.

**Response:** No change. Comment noted.

**2. Issue:** The discussion of state initiatives to conserve and enhance aquatic habitat and water quality does not mention the adoption in 2001 of Forest Practice Rules for non-federal forested lands. Because the impacts of forest land-uses affect Puget Sound, PSAT should support full funding of the forest practices program, the adaptive management program, and non-industrial forest landowner incentive programs, and acknowledge the importance of the forest practices program in protecting habitat and water quality.

**Response:** The *Priorities* document should have included the 2001 adoption of Forest Practice Rules as an example of progress in managing all lands surrounding Puget Sound. Local and tribal government partners, Conservation Districts, education programs and state agencies offer assistance and education for non-industrial forest landowners in protecting critical areas under this priority.

**3. Issue:** The objective to increase the acres of land permanently protected through reserves and acquisitions should focus on improving the management plans for reserves by helping local governments improve land use regulations in areas that affect the reserves. There is a need to increase funding, streamline the process and educate citizens about options at both the local and state level.

**Response:** This result now includes “properly managed” aquatic reserves, and DNR has added a result for managing state-owned aquatic lands. Action Team partners will provide technical assistance in growth management and shoreline master program updates to local governments with DNR aquatic reserves. There is a new result to provide citizens with public education and involvement and technical assistance, including options for reserves and acquisitions. In addition, Priority 6 includes results for the Conservation Districts in their work with landowners through the Conservation Reserve and Enhancement Program.

**4. Issue:** Developing a landscape-scale computer model to assist jurisdictions in improved and more consistent protection of nearshore areas is a high priority.

**Response:** No change, as this comment supports an existing result to develop a landscape-scale computer model to assist jurisdictions.

**5. Issue:** The measure of results should be in acres and number of sites. Measures should be categorized by type of protection action.

**Response:** No change. The Action Team partners will report on progress for this priority using acres protected through DNR aquatic reserves, conservation easements, and land acquisition and will do so as much as possible by type of protection action. The Interagency Committee for Outdoor Recreation tracks funding through the Salmon Recovery Funding Board and Aquatic Lands Enhancement Account using a database that includes both acres and numbers of sites.

**6. Issue:** Add an objective for Priority 5 that Action Team partner agencies participate with local governments and marine science education organizations to build community support for, create and monitor local marine protected areas such as those in Seattle, Edmonds and Des Moines. Action Team agencies are encouraged to support the City of Seattle’s Marine Protected Area designations, to identify environmentally important areas on a Soundwide level, and to work with adjacent communities to encourage protection.

**Response:** A result is added to provide technical assistance for creating and monitoring local marine protected areas. The Action Team staff and partner agencies support these efforts as resources allow.

**7. Issue:** The document should include an objective to prohibit new shoreline armoring.

**Response:** No change. The Action Team does not have the authority to prohibit shoreline armoring. However, accomplishing the results for this priority should result in a reduction of shoreline armoring in Puget Sound. In addition, a result is added to provide education to key audiences on alternatives to traditional “hard” methods of shoreline protection.

**8. Issue:** The state should focus resources on educating and involving citizens to encourage environmental stewardship, as well as technical assistance, government cost sharing or incentives for programs addressing water quality and related concerns. Conservation Districts offer excellent examples of public-private partnerships and should be accorded a high priority in funding requests.

**Response:** Results are added to address public education, stewardship and technical assistance to assist local governments. The Action Team partnership included funding for Conservation Districts in past work plan budgets through the Conservation Commission, in support of the important work they do in each Puget Sound county. Results related to Conservation District incentive programs are now included under Priority 6, and their work with the agricultural community and small non-commercial farms is reflected in results in Priority 4.

**9. Issue:** Protecting shoreline areas that serve as critical spawning habitat for forage fish is a high priority for San Juan County and for the greater ecosystem. The Action Team should conduct research into the natural processes of shorelines to identify environmentally important areas on a Soundwide level and work with adjacent communities to encourage protection.

**Response:** No change to this priority. The Puget Sound Nearshore Ecosystem Restoration Project will include this research (see priority 6). Action Team partners added forage fish to Priority 7 as a species of concern to conserve and recover.

**10. Issue:** The work plan should include a critical assessment of regulatory failure in protecting the environment.

**Response:** No change. Since the work plan is a document focused on the work to be done in the next biennium, Action Team partners are unable to include a critical assessment of regulatory failure. See Response 5 under Priority 2 regarding audits of the National Pollutant Discharge Elimination System (NPDES) permit program administered by Ecology. The NPDES and other regulatory programs are increasingly required to include provisions for effectiveness monitoring. In addition, Action Team partner agencies are beginning to track permitted actions and required mitigation so that future analyses of regulatory effectiveness can be conducted.

**11. Issue:** Initiate demonstration projects with alternative protection mechanisms such as community conservation compacts using covenants and individual deeds and education to “relocate” responsibility from state and county governments to communities.

**Response:** No change. The first result in this priority includes alternative protection mechanisms. Another result includes providing citizens with information and technical assistance for restoration and stewardship in the context of voluntary actions, and these innovative suggestions are good examples to include in those efforts.

**12. Issue:** A proposed project in Hood Canal to move gravel to a pier by conveyor belt to be loaded on barges for shipment out of the canal has a number of issues related to ecosystem protection and transportation. The coalition asks the state to consider denying permits to prevent harm.

**Response:** No change. The appropriate Action Team agencies will review permit applications and will make decisions based upon their regulatory responsibilities under state law.

**13. Issue:** Threats to shorelines and other critical areas include population growth and accompanying modification of natural shorelines, stormwater and flood damage. Solutions should include protecting land through actions such as easements, updates of growth management and shorelines plans and regulations, and enforcement of these regulations.

**Response:** No change, as the comment supports the strategic approaches for the priority. The proposed solutions are included in the desired results for Priority 5.

## **Priority 6: Restore degraded nearshore and freshwater habitats**

**1. Issue:** Add language to support monitoring and assessing eelgrass beds and forage fish spawning beaches, connecting small urban streams, and project-specific monitoring and adaptive management for all restoration projects. Seek funding for monitoring restoration projects.

**Response:** Priority 5 now includes a result for DNR to track temporal trends in the extent of eelgrass and floating kelp resources. Priority 7 now includes forage fish as species at risk and has a result for monitoring these species. A number of state agencies, local governments, tribes, Regional Fisheries Enhancement Groups, Marine Resources Committees, citizen groups and others are involved in eelgrass and forage fish monitoring and assessments. The Puget Sound Nearshore Ecosystem Restoration Project (PSNERP) provides broad project guidance to restoration practitioners that recommends including monitoring and adaptive management as part of any restoration plan. This guidance was also forwarded to the Salmon Recovery Funding Board (SRFB) for their consideration in setting funding criteria, and most SRFB projects currently require some level of monitoring. Many other sources of funding, however, do not include provisions for monitoring and adaptive management. Funding sources are encouraged to include these criteria and to allow a reasonable amount of the project cost to consist of monitoring and adaptive management.

**2. Issue:** Set a target to improve all drift cells by the end of the biennium.

**Response:** The result for projects to restore drift cell function will include a target for the biennium, but a target of all drift cells is not feasible. Puget Sound is made up of hundreds of individual drift cells, many of which are still in functioning condition. However, jurisdictions with marine shorelines that are updating their shoreline master programs (SMPs) will evaluate the function of drift cells within their jurisdiction and make efforts to improve many of them through stronger policies and regulations in their shoreline master programs over the next decade of SMP updates.

**3. Issue:** Commit substantial effort to fully fund the Puget Sound Nearshore Ecosystem Restoration Project (PSNERP).

**Response:** No change. The PSNERP partnership currently benefits from a broad base of stakeholders including local, tribal and state governments as well as non-governmental organizations. Significant efforts have been and will continue to be made in securing federal appropriations that match the non-federal level of commitment. Budget contributions from state agencies will be presented with other budget information in the Fall 2004 agency and work plan budgets to be submitted to the governor and the legislature.

**4. Issue:** Set a target of 50 percent reduction of *Spartina spp.* acreage within the biennium.

**Response:** The state Department of Agriculture will formulate a percentage target based on its proposed budget for the 2005-2007 biennium and will provide the target in the Fall 2004 work plan. A 50 percent target recommendation is ambitious given the current level of funding for *Spartina* removal at the state level. Additional funding sources can be sought to augment the state commitment.

**5. Issue:** Costs to individual farmers and the agricultural community are not adequately considered when restoring habitat.

**Response:** No change. Comment noted. Restoration projects are performed on land that is acquired from willing sellers. A number of incentive programs exist to make voluntary restoration on privately owned land cost-effective for the landowner. However, watershed and salmon recovery groups should involve adjacent landowners where restoration of one property could have effects on nearby properties.

**6. Issue:** Adopt site-based zoning and management for Puget Sound.

**Response:** No change. The environment designation provision of Shoreline Master Programs (SMPs) allows local governments to designate appropriate uses for shorelines and aquatic lands in their jurisdictions. The upcoming SMP updates will review and revise designations under the new criteria adopted by Ecology. In addition, the Department of Natural Resources has recently adopted procedures for designating state-owned aquatic lands for various uses including aquatic reserves. Upland and riparian land use zoning changes may be accomplished through updates of Growth Management Comprehensive Plans and ordinances to protect critical areas.

## **Priority 7: Conserve and recover orca, salmon, forage fish and groundfish**

**1. Issue:** Add other (or all declining) species of concern to this priority. Add an objective to establish and maintain a long-term assessment of populations of all major species groups in the Puget Sound ecosystem.

**Response:** Priority 7 includes species for which Action Team agencies are taking conservation and recovery actions. Forage fish are added to the list of species with a result to implement WDFW's Forage Fish Management Plan. A result is added to monitor the status and trends of declining species. Desired results in the section on science include a result for monitoring the status and trends of marine bird species and other species.

**2. Issue:** Edit the statement that recovery of salmon and groundfish "will improve" prey availability for orca be changed to "may improve." Edit the narrative to reflect the Washington Department of Fish and Wildlife's recommendation that killer whales be listed as endangered.

**Response:** Make this correction in the narrative as appropriate to the shortened narratives in the Fall 2004 work plan.

**3. Issue:** Add an objective that the Action Team will examine the overall health of the entire Puget Sound food web, including examining existing studies and perhaps convening a conference on the subject.

**Response:** The science section includes a result for holding the next Puget Sound/Georgia Basin Research Conference and the Action Team can consider reviewing the overall health of the food web. PSAMP will consider this comment as it develops more detailed results for the next biennium.

**5. Issue:** Add an objective that Action Team partner agencies participate with local governments and marine science education organizations to develop and implement orca recovery plans developed by NOAA and Canada's Department of Fisheries and Oceans.

**Response:** Coordination of recovery plans is included in one of the strategies for this priority. There is a new result regarding public information and involvement around the conservation and recovery of these species.

**6. Issue:** Remove the objective related to target numbers for on-the-water enforcement staff from the Department of Fish and Wildlife.

**Response:** This change has been made.

**7. Issue:** Change the objective on rockfish recovery areas to: Develop a strategy for implementing rockfish recovery areas based upon habitat needs, experiences from other protected and unprotected areas, and input from public, tribal and government partners. Include the need for monitoring and evaluation of the efficacy of these areas.

**Response:** Washington Department of Fish and Wildlife addresses the rockfish recovery effort in a result to minimize harvest impacts. The department continues to develop a rockfish management and conservation plan. State and tribal co-managers, local Marine

Resources Committees and others continue to seek innovative solutions to the complex issues related to designating and managing rockfish recovery areas.

**8. Issue:** Work with the U.S. Fish and Wildlife Service (USFWS) to consider extending existing National Wildlife Refuge and wilderness areas in the San Juan Islands and Strait of Juan de Fuca.

**Response:** The USFWS is an ex-officio member of the Action Team partnership. As the state, tribal and local governments and others identify conservation tools needed to protect the Sound, the federal service can assist the partnership to better understand what can be considered under their Comprehensive Conservation Planning process under NEPA.